

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

dosborn@
ltrust@

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 1/4/2024

MEMO ENDORSED

January 3, 2024

VIA ECF

Honorable Barbara C. Moses
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Crosbie v. Commissioner of Social Security*
Civil Action No. 1:23-cv-07890-BCM

Dear Judge Moses,

We write on behalf of our client, Philecia Kerrie Crosbie, with the consent of the defense, to request additional time to file her motion for judgment on the pleadings which is currently due on January 6, 2024, per the Court's October 11, 2023 Scheduling Order. This is the parties' first request for an extension. The reason for this request is that Plaintiff's counsel currently has five Social Security briefs due this week with another twelve briefs due next week.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **April 5, 2024;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **July 5, 2024;** and
- Plaintiff to file her reply, if any, on or before: **July 19, 2024.**

Honorable Barbara C. Moses
January 3, 2024
Page Two

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Jonathan King, Esq. (by ECF)

Application GRANTED. SO ORDERED.



Barbara Moses
United States Magistrate Judge
January 4, 2024